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Schuyler Hoffman

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**SCHUYLER HOFFMAN,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No.: 3:12-cv-539 JAH (DHB)

**DECLARATION OF ABBAS
KAZEROUNIAN IN SUPPORT OF
PLAINTIFF'S REPLY TO
OBJECTOR SUSAN HOUSE'S
OPPOSITION TO PLAINTIFF'S
MOTION FOR FINAL APPROVAL
AND MOTION FOR ATTORNEYS'
FEES**

DATE: November 3, 2014

TIME: 2:30 p.m.

COURTROOM: 13B

HON. JOHN A. HOUSTON

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DECLARATION OF ABBAS KAZEROUNIAN, ESQ.

I, ABBAS KAZEROUNIAN, declare:

1. I am one of the attorneys for the Plaintiff in this action, and I am named as Class Counsel for the Settlement Class in the Court's February 13, 2014 Order preliminarily approving the settlement. I submit this declaration in support of Plaintiff's Opposition to Objector Susan House's Opposition to Plaintiff's Motion for Final Approval and Motion for Attorneys' Fees.
2. I am licensed to practice law before this court and all California state courts and all federal courts located in the State of California. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I did not know Schuyler Hoffman while I attended California Western School of Law.
4. I did not meet Schuyler Hoffman for more than two years after I graduated from California Western School of Law.
5. Following receipt of Susan House's ("House") objection to this matter, I contacted House's counsel, Joseph Darrell Palmer ("Palmer"), to meet and confer on the matters raised in said objection.
6. Thereafter, I met with Palmer for a half-day discussion facilitated by the Honorable Herbert Hoffman (Ret.).
7. As a result of this discussion, I agreed to extend the claims period to October 21, 2014 upon Court approval of said extension.
8. During this time, all late claims will be accepted any previously rejected claims may be resubmitted.
9. Upon an additional Court Order, I will ask the Claims Administrator amend the settlement website to inform consumers of the extended class period.

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1 10. For the services to the class, I request that House receive \$500 of the \$1,500
2 incentive award previously requested by Hoffman should the Court deem this
3 appropriate.

4 11. I also request that Palmer receive \$35,000 of the attorneys' fees previously
5 requested by class counsel should the Court deem this appropriate.

6 12. After meeting and conferring before Judge Hoffman as well as reviewing Class
7 Counsel's Reply in Support of Final Approval, House has agreed to withdraw
8 House's objection to this class settlement. A true and correct copy of said
9 Stipulation is attached hereto as Exhibit A.

10
11 I declare under penalty of perjury of the laws of California and the United
12 States that the foregoing is true and correct, and that this declaration was executed
13 in Costa Mesa, California on September 25, 2014

14
15 By: /s/ Abbas Kazerounian
16 Abbas Kazerounian, Esq.